

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STEVE SANDS,

Plaintiff,

-against-

BAUER MEDIA GROUP USA, LLC,

Defendant.

No.: 1:17-cv-09215 (LAK)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 16, 26, and 37, and upon the accompanying memorandum of law, and the Declaration of Terence P. Keegan, Bauer Media Group USA, LLC moves this Court, before the Honorable Lewis A. Kaplan at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY, to 1) dismiss Plaintiff Steve Sands' ("Sands") complaint, or 2a) in the alternative, to strike portions of Sands' testimony and evidence in support of summary judgment – and/or 2b) for a bond as a security for costs and fees under Local Civil Rule 54.2, and such other relief as the Court deems just and proper.

DATED: New York, New York
November 2, 2018

MILLER KORZENIK SOMMERS RAYMAN LLP

By: /s/ Terence P. Keegan

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